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SA



BellSouth Telecommunications, Inc.
Legal Department
1600 Williams Street
Suite 5200
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner
General Counsel-South Carolina

803 401 2900
Fax 803 254 1731

September 14, 2005

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

RECEIVED
2005 SEP 14 PM 2:56
SC PUBLIC SERVICE
COMMISSION

Re: Enforcement of Interconnection Agreement between BellSouth
Telecommunications, Inc. and NuVox Communications, Inc.
Docket No. 2005-82-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of John T. Tyler in the above-referenced matter. By copy of this letter, I am serving the same on all parties of record.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patrick W. Turner

PWT/sgm
Enclosures
cc: All Parties of Record
DM5 #601623

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

RECEIVED
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SC PUBLIC SERVICE
COMMISSION

In Re:)

Enforcement of Interconnection Agreement)
between BellSouth Telecommunications, Inc)
and NuVox Communications, Inc.)

Docket No. 2005-82-C

MOTION FOR ADMISSION PRO HAC VICE

BellSouth Telecommunications, Inc. ("BellSouth") respectfully moves the Public Service Commission of South Carolina ("the Commission") to permit John T. Tyler, to practice pro hac vice before the Commission in the above-referenced matter. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Tyler, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina. Exhibit A to this Motion is a file-stamped copy of that application, along with a Certificate of Service indicating that the application and the \$100 filing fee have been filed with the Supreme Court.

Respectfully submitted, this 14th day of September 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.



PATRICK W. TURNER
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

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COMMISSION

EXHIBIT A



BellSouth Telecommunications, Inc.
Legal Department
1600 Williams Street
Suite 5200
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner
General Counsel-South Carolina

803 401 2900
Fax 803 254 1731

September 14, 2005

RECEIVED

SEP 14 2005

Ms. Gail Watts
Deputy Clerk for Admissions
South Carolina Supreme Court of Bar Admissions
P. O. Box 11330
Columbia, South Carolina 29211

S.C. SUPREME COURT

Re: Enforcement of Interconnection Agreement between BellSouth
Telecommunications, Inc. and NuVox Communications, Inc.
Docket No. 2005-82-C

Dear Ms. Watts:

Pursuant to Rule 404 of the S.C.A.C.R., enclosed for filing are the original and one copy of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of John T. Tyler, in the above-referenced matter with the requested filing fee of \$100.00.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Patrick W. Turner

PWT/sgm
Enclosures
cc: All Parties of Record
DM5 #601617

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

SEP 14 2005

SOUTH CAROLINA SUPREME COURT

In Re:

Enforcement of Interconnection Agreement
between BellSouth Telecommunications, Inc
and NuVox Communications, Inc.

Docket No. 2005-82-C

**APPLICATION FOR ADMISSION
PRO HAC VICE**

Comes now John T Tyler, applicant herein, and respectfully represents the following:

1. Applicant is an employee of BellSouth Telecommunications, Inc., 675 West Peachtree Street, NE, Atlanta, Fulton County, Georgia, 30375, Telephone Number 404-335-0757, Fax Number 404 614-4054, as in-house counsel.

2. Applicant has been retained personally or as a member of the above named legal department to provide legal representation in connection with the above case now pending before named court of the State of South Carolina.

3. Since October of 1997, applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Georgia. Attached is a certificate of good standing.

4. Applicant has been admitted to practice before the following courts:

Court:

Date Admitted.

United States District Ct. – N.Dist. GA

October 24, 1997

United States Ct. of Appeals – 11th Circuit

October 24, 1997

All Georgia Courts – Supreme, Superior and State October 24, 1997

Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency.

6. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

7. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked.


8. Local counsel of record associated with applicant in this case is Patrick W. Turner of BellSouth Telecommunications, Inc., Suite 5200, 1600 Williams Street, Richland County, Columbia, South Carolina, 29201, Telephone Number (803) 401-2900.

9. Applicant has not previously filed an application to appear *pro hac vice* in South Carolina.

10. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

11. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 12th day of September, 2005.



APPLICANT

VERIFICATION

STATE OF GEORGIA)
)
COUNTY OF FULTON)

I, John T. Tyler, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents I hereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.



APPLICANT/AFFIANT

Subscribed and sworn to before me this 12 day of September, 2005.



Notary Public for the State of Georgia

My Commission Expires: _____
Lynn J. Barclay
Notary Public, DeKalb County, Georgia
My Commission Expires August 13, 2006.

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 14th day of September, 2005.



Local Counsel of Record

STATE BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Mr. John Thomas Tyler
BellSouth Telecommunications, Inc.
1025 Lenox Park Boulevard, Suite 6C01
Atlanta, GA 30319-5309

CURRENT STATUS: Active Member

DATE OF ADMISSION TO PRACTICE: 10/24/1997

Attorney Bar Number: 721154

Today's Date: September 6, 2005

Listed below are the disciplinary actions, if any, which have been taken against this member:

| Supreme Court Docket # | State Disciplinary Board Docket # | Disposition |
|------------------------|-----------------------------------|-------------|
| NA | NA | N/A |

The prerequisites for practicing law in the State of Georgia are as follows:

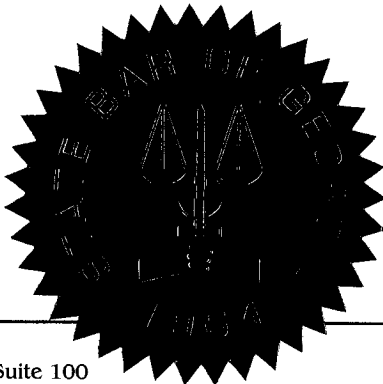
- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (**Reciprocity**).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. The Attorney may upon application, if they so choose apply for admission to the Supreme, District and the Georgia Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

This document hereby certifies that the above-mentioned individual is a registered member of the State Bar of Georgia and is currently in good standing.



STATE BAR OF GEORGIA

Toni Peterson

Toni Peterson
Official Representative of State Bar of Georgia

HEADQUARTERS

104 Marietta Street, Suite 100
Atlanta, Georgia 30303
(404) 527-8700 ■ (800) 334-6865
FAX (404) 527-8717
www.gabar.org

SOUTH GEORGIA

244 E. Second Street (Zip 31794)
P.O. Box 1390
Tifton, Georgia 31793-1390
(229) 387-0446 ■ (800) 330-0446
FAX (229) 382-7435

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by hand delivery mail addressed to: South Carolina Supreme Court Office of Bar Admissions, P.O. Box 11330, Columbia, SC 29211, accompanied by payment of the \$100 filing fee payable to the South Carolina Supreme Court on this

12th day of September, 2005.



APPLICANT/AFFIANT

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) **CERTIFICATE OF SERVICE**

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of John T. Tyler in Docket No. 2005-82-C to be served upon the following this September 14, 2005:

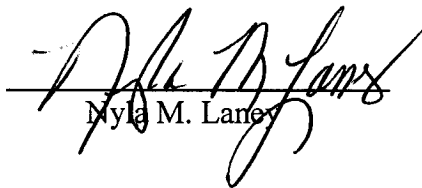
Benjamin P. Mustian, Esquire
Florence P. Belser, Esquire
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Ellis Lawhorne & Sims, P.A.
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(NewSouth, NuVox, KMC, Xspedius)
(U. S. Mail and Electronic Mail)



Nyla M. Laney

PC Docs # 578975